



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

5965 2181

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

November 8, 2018

Douglas McWilliams  
Squire, Sanders & Dempsey, L.L.P.  
4900 Key Tower  
127 Public Square  
Cleveland, Ohio 44114

Re: Chemical Recovery System, Inc., OH Site ID 0521  
Bill Number 2751926T0012 \$57,725.05

Dear Mr. McWilliams:

The U.S. Environmental Protection Agency (EPA) under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended, 42 U.S.C 9601 et seq., is seeking to recover costs paid by EPA for activities undertaken at the Chemical Recovery System, Inc., OH (the Site). This billing is transmitted pursuant to the reimbursement provisions set forth in the United States v. A.K. Steel Corporation., et.al Consent Decree, 1:10 CV 00996 and is solely for the for the recovery of EPA's response costs. Any fines and/or penalties due will be billed separately.

Enclosed is the accounting of the costs for the Site for the period July 17, 2017 through July 16, 2018, reflecting the amount of \$57,725.05. This amount is due to be paid within 30 days of receipt of this bill, pursuant to the terms of the settlement agreement.

If payment is not received within that time frame, interest will accrue on any unpaid amounts from the date of your receipt. The current interest rate is 1.75%. Please review and adhere to all procedures and requirements, as specified in the settlement agreement, for making payment and for disputing all or part of the costs invoiced. If you intend to dispute any of the costs, please follow as required by Section XIX, Dispute Resolution.

Failure to comply with these requirements may subject the respondent to **stipulated** penalties. Non-compliance may also result in further collections efforts, including referring the debt to the Department of Justice (DOJ).

Please forward your payment by wire transfer to the following bank:

Federal Reserve Bank of New York  
ABA # 021030004  
Account #68010727  
SWIFT address = FRNYUS33  
33 Liberty Street  
New York, NY 10045  
Field Tag 4200 of the Fedwire message should read 'D 68010727 Environmental Protection Agency'

In order for EPA to accurately record receipt of your payment, you are advised to include the following information on your remittance:

- Chemical Recovery System, OH
- Site ID 0521
- Bill Number 2751926T0012

If you have any questions regarding the billed costs or other legal matters concerning the Site, the following individual in EPA's Office of Regional Counsel may be contacted:

Richard Nagle, Associate Regional Counsel  
U.S. Environmental Protection Agency  
77 West Jackson Blvd - C-14J  
Chicago, Illinois 60604  
312-353-8222  
[nagle.richard@epa.gov](mailto:nagle.richard@epa.gov)

If you have any questions regarding Site work activities, the following individual may be contacted:

Jennifer Elkins, Remedial Project Manager  
U.S. Environmental Protection Agency  
77 West Jackson Blvd - SR-6J  
Chicago, Illinois 60604  
312 353-4627  
[elkins.jennifer@epa.gov](mailto:elkins.jennifer@epa.gov)

Please send notification of payment to Ms. Elkins and Mr. Nagle.

Thank you for your cooperation.

Sincerely,

*for Linda Hile*

Richard D. Hackley, Chief  
Program Accounting & Analysis Section

Enclosures

cc: Richard Nagle, C-14J  
Jennifer Elkins, SR-6J

US EPA - Lori Weidner, Cincinnati Finance Center

## Itemized Cost Summary

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

<b>REGIONAL PAYROLL COSTS .....</b>	<b>\$26,795.59</b>
<b>SUPERFUND COOPERATIVE AGREEMENT (SCA)</b>	
OHIO ENVIRONMENTAL PROTECTION AGENCY (V02E01185) .....	\$9,268.95
OHIO ENVIRONMENTAL PROTECTION AGENCY (V03E01185) .....	\$801.46
<b>TECHNICAL SERVICE AND SUPPORT</b>	
PRIMUS SOLUTIONS, INC. (EPW11024) .....	\$25.19
ARCTIC SLOPE MISSION SERVICES (EPW17011) .....	\$257.33
<b>EPA INDIRECT COSTS .....</b>	<b>\$20,576.53</b>
<b>Total Site Costs:</b>	<b>\$57,725.05</b>

## Regional Payroll Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
ELKINS, JENNIFER	2017	21	6.50	448.04
JUNGMANN, JENNIFER		22	1.00	70.84
Environmental Engineer		23	13.50	956.34
		26	4.00	283.36
		27	12.00	850.07
	2018	02	9.25	657.36
		03	8.00	568.54
		04	6.00	426.39
		14	4.00	289.00
			<u>64.25</u>	<u>\$4,549.94</u>
FISCHER, TIMOTHY	2017	26	0.25	21.19
ENVIRONMENTAL ENGINEER		27	1.50	127.14
			<u>1.75</u>	<u>\$148.33</u>
HAILE, LINDA	2018	03	0.50	35.14
LEAD ACCOUNTANT			<u>0.50</u>	<u>\$35.14</u>
MARTIN, LINDA	2018	02	1.00	85.11
ENVIRONMENTAL SCIENTIST			<u>1.00</u>	<u>\$85.11</u>
MBOGO, VANESSA	2017	22	0.75	51.53
SIMMONS, VANESSA		23	4.00	274.53
ACCOUNTANT		25	0.50	34.31
	2018	02	0.25	17.16
		03	0.25	17.16
		05	0.25	17.16
		10	0.25	17.51
		11	0.25	17.51
			<u>6.50</u>	<u>\$446.87</u>
MULLINS, VALERIE	2018	11	18.00	1,170.03
ENVIRONMENTAL PROTECTION SPECIALIST		12	25.00	1,625.06
			<u>43.00</u>	<u>\$2,795.09</u>
NAGLE, RICHARD	2017	22	1.50	141.17
GENERAL ATTORNEY		26	1.50	141.04

## Regional Payroll Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
NAGLE, RICHARD	2018	01	1.50	141.04
		02	1.00	94.04
		03	1.50	141.06
		04	1.00	92.72
		05	1.00	87.27
		06	1.00	94.06
		07	0.50	47.03
		13	1.00	96.08
		14	1.50	144.12
		15	1.00	96.09
		16	1.50	144.13
		17	0.50	48.04
		18	0.50	48.04
		19	0.50	48.04
			<u>17.00</u>	<u>\$1,603.97</u>
OHL, MATTHEW	2018	06	1.00	80.56
ENVIRONMENTAL SCIENTIST		09	3.75	308.40
		10	6.50	534.00
			<u>11.25</u>	<u>\$922.96</u>
PALOMEQUE, ADRIAN	2018	07	19.50	871.66
Public Affairs Specialist		08	32.25	1,755.87
		09	16.50	926.21
		10	1.75	98.24
			<u>70.00</u>	<u>\$3,651.98</u>
WILSON, DAVID	2017	26	42.00	3,389.16
ENVIRONMENTAL SCIENTIST		27	32.00	2,582.24
	2018	08	9.00	740.79
		09	42.00	3,457.03
		10	29.00	2,386.98
			<u>154.00</u>	<u>\$12,556.20</u>
Total Regional Payroll Costs			<u>369.25</u>	<u>\$26,795.59</u>

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

SUPERFUND COOPERATIVE AGREEMENT (SCA)

State Agency: OHIO ENVIRONMENTAL PROTECTION AGENCY

SCA Number: V02E01185

Project Officer(s): GLYNIS LANDERS

Dates of Service: From: To:

Summary of Service:

Total Costs: \$9,268.95

Drawdown Number	Drawdown Date	Drawdown Amount	Treasury Schedule Number and Date		Site Amount
311334820C	07/31/2017	10,992.91	72123997341	07/31/2017	725.88
311334820C	08/14/2017	7,441.21	72263997341	08/14/2017	568.78
311334820C	08/28/2017	8,310.54	72403997341	08/28/2017	298.42
311334820C	09/12/2017	6,387.82	72553997341	09/12/2017	161.35
311334820C	09/22/2017	15,117.47	72653997341	09/22/2017	427.71
311334820C	10/10/2017	13,386.99	82833997341	10/10/2017	632.87
311334820C	10/26/2017	11,365.73	82993997341	10/26/2017	931.60
311334820C	11/03/2017	9,069.80	83073997341	11/03/2017	1,990.75
311334820C	11/20/2017	8,603.70	83243997341	11/20/2017	675.17
311334820C	12/04/2017	14,599.81	83383997341	12/04/2017	747.65
311334820C	12/21/2017	7,181.56	83553997341	12/21/2017	227.99
311334820C	01/18/2018	6,290.08	80183997341	01/18/2018	192.88
311334820C	01/26/2018	4,018.64	80263997341	01/26/2018	336.52
311334820C	02/09/2018	8,297.59	80403997341	02/09/2018	830.44
311334820C	03/09/2018	8,042.49	80683997341	03/09/2018	192.73
311334820C	03/23/2018	11,869.46	80823997341	03/23/2018	197.74
311334820C	04/09/2018	3,600.46	80993997341	04/09/2018	130.47
Total:					\$9,268.95

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

SUPERFUND COOPERATIVE AGREEMENT (SCA)

State Agency: OHIO ENVIRONMENTAL PROTECTION AGENCY

SCA Number: V03E01185

Project Officer(s): GLYNIS LANDERS

Dates of Service: From: To:

Summary of Service:

Total Costs: \$801.46

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Drawdown Number	Drawdown Date	Drawdown Amount	Treasury Schedule Number and Date		Site Amount
311334820C	05/24/2018	15,295.57	81443997341	05/24/2018	195.05
311334820C	06/11/2018	14,169.06	81623997341	06/11/2018	539.63
311334820C	07/16/2018	6,998.54	81973997341	07/16/2018	66.78
Total:					<u>\$801.46</u>



## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

TECHNICAL SERVICE AND SUPPORT

Contractor Name: PRIMUS SOLUTIONS, INC.

EPA Contract Number: EPW11024

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	19	01/01/2017	01/29/2017

Project Officer(s): CALVIN, LYNN

Dates of Service: From: To:

Summary of Service: TECHNICAL SERVICES AND SUPPORT

Total Costs: \$25.19

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<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
58	06/29/2017	69,802.26	AVC170222 07/21/2017	25.19
Total:				<u><u>\$25.19</u></u>

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

TECHNICAL SERVICE AND SUPPORT

Contractor Name: ARCTIC SLOPE MISSION SERVICES

EPA Contract Number: EPW17011

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	42	07/31/2017	04/29/2018

Project Officer(s): QUESADA, TODD

Dates of Service: From: To:

Summary of Service: TECHNICAL SERVICES AND SUPPORT

Total Costs: \$257.33

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
7	09/13/2017	96,491.94	AVC180010 10/13/2017	50.60
9	11/16/2017	104,012.64	AVC180055 12/05/2017	25.30
10	12/15/2017	90,871.12	AVC180088 01/02/2018	12.65
13	03/05/2018	65,872.39	AVC180160 03/29/2018	117.53
16	05/09/2018	131,169.57	AVC180225 06/01/2018	51.25
Total:				<u>\$257.33</u>

## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate( %)</u>	<u>Indirect Costs</u>
2017	11,578.29	55.39%	6,413.19
2018	25,570.23	55.39%	14,163.34
	<u>37,148.52</u>		
Total EPA Indirect Costs			<u>\$20,576.53</u>

## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
ELKINS, JENNIFER	2017	21	448.04	55.39%	248.17
		22	70.84	55.39%	39.24
		23	956.34	55.39%	529.72
		26	283.36	55.39%	156.95
		27	850.07	55.39%	470.85
			2,608.65		\$1,444.93
FISCHER, TIMOTHY	2017	26	21.19	55.39%	11.74
		27	127.14	55.39%	70.42
			148.33		\$82.16
MBOGO, VANESSA	2017	22	51.53	55.39%	28.54
		23	274.53	55.39%	152.06
		25	34.31	55.39%	19.00
			360.37		\$199.60
NAGLE, RICHARD	2017	22	141.17	55.39%	78.19
		26	141.04	55.39%	78.12
			282.21		\$156.31
WILSON, DAVID	2017	26	3,389.16	55.39%	1,877.26
		27	2,582.24	55.39%	1,430.30
			5,971.40		\$3,307.56
Total Fiscal Year 2017 Payroll Direct Costs:			9,370.96		\$5,190.56

EPA Indirect Costs  
 CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
 Costs From July 17, 2017 through July 16, 2018

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPW11024	58	07/21/2017	25.19	0.00	55.39%	13.95
			25.19	0.00		\$13.95
V02E01185	311334820C	07/31/2017	725.88	0.00	55.39%	402.06
		08/14/2017	568.78	0.00	55.39%	315.05
		08/28/2017	298.42	0.00	55.39%	165.29
		09/12/2017	161.35	0.00	55.39%	89.37
		09/22/2017	427.71	0.00	55.39%	236.91
			2,182.14	0.00		\$1,208.68
Total Fiscal Year 2017 Other Direct Costs:			2,207.33	0.00		\$1,222.63
Total Fiscal Year 2017:			11,578.29			\$6,413.19

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
ELKINS, JENNIFER	2018	02	657.36	55.39%	364.11
		03	568.54	55.39%	314.91
		04	426.39	55.39%	236.18
		14	289.00	55.39%	160.08
			1,941.29		\$1,075.28
HAILE, LINDA	2018	03	35.14	55.39%	19.46
			35.14		\$19.46
MARTIN, LINDA	2018	02	85.11	55.39%	47.14
			85.11		\$47.14

## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

Costs From July 17, 2017 through July 16, 2018

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
MBOGO, VANESSA	2018	02	17.16	55.39%	9.50
		03	17.16	55.39%	9.50
		05	17.16	55.39%	9.50
		10	17.51	55.39%	9.70
		11	17.51	55.39%	9.70
			<u>86.50</u>		<u>\$47.90</u>
MULLINS, VALERIE	2018	11	1,170.03	55.39%	648.08
		12	1,625.06	55.39%	900.12
			<u>2,795.09</u>		<u>\$1,548.20</u>
NAGLE, RICHARD	2018	01	141.04	55.39%	78.12
		02	94.04	55.39%	52.09
		03	141.06	55.39%	78.13
		04	92.72	55.39%	51.36
		05	87.27	55.39%	48.34
		06	94.06	55.39%	52.10
		07	47.03	55.39%	26.05
		13	96.08	55.39%	53.22
		14	144.12	55.39%	79.83
		15	96.09	55.39%	53.22
		16	144.13	55.39%	79.83
		17	48.04	55.39%	26.61
		18	48.04	55.39%	26.61
		19	48.04	55.39%	26.61
			<u>1,321.76</u>		<u>\$732.12</u>
OHL, MATTHEW	2018	06	80.56	55.39%	44.62
		09	308.40	55.39%	170.82
		10	534.00	55.39%	295.78
			<u>922.96</u>		<u>\$511.22</u>

EPA Indirect Costs  
 CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
 Costs From July 17, 2017 through July 16, 2018

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
PALOMEQUE, ADRIAN	2018	07	871.66	55.39%	482.81
		08	1,755.87	55.39%	972.58
		09	926.21	55.39%	513.03
		10	98.24	55.39%	54.42
			3,651.98		\$2,022.84
WILSON, DAVID	2018	08	740.79	55.39%	410.32
		09	3,457.03	55.39%	1,914.85
		10	2,386.98	55.39%	1,322.15
			6,584.80		\$3,647.32
Total Fiscal Year 2018 Payroll Direct Costs:			17,424.63		\$9,651.48

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPW17011	7	10/13/2017	50.60	0.00	55.39%	28.03
	9	12/05/2017	25.30	0.00	55.39%	14.01
	10	01/02/2018	12.65	0.00	55.39%	7.01
	13	03/29/2018	117.53	0.00	55.39%	65.10
	16	06/01/2018	51.25	0.00	55.39%	28.39
			<u>257.33</u>	<u>0.00</u>		<u>\$142.54</u>
V02E01185	311334820C	10/10/2017	632.87	0.00	55.39%	350.55
		10/26/2017	931.60	0.00	55.39%	516.01
		11/03/2017	1,990.75	0.00	55.39%	1,102.68
		11/20/2017	675.17	0.00	55.39%	373.98
		12/04/2017	747.65	0.00	55.39%	414.12
		12/21/2017	227.99	0.00	55.39%	126.28
		01/18/2018	192.88	0.00	55.39%	106.84
		01/26/2018	336.52	0.00	55.39%	186.40

